

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RONALD C. FAGAN, M.D., P.C., et al.

*

Plaintiff

*

Civil Case No. 23-cv-02095-TJS

v.

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U.S. DEPARTMENT OF HEALTH
AND HUMAN SERVICES, et al.

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Defendants

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CONSENT MOTION FOR EXTENSION OF TIME

Defendants, by and through, Erek L. Barron, United States Attorney for the District of Maryland, and Rebecca A. Koch, Assistant United States Attorney for said District, hereby request the Court extend its time to respond to Plaintiffs' Amended Complaint (ECF No. 43) by sixty (60) days through and including October 11, 2024, and in support thereof states as follows:

1. On July 29, 2024, Plaintiffs filed an Amended Complaint adding two new Plaintiffs and additional causes of action. *See* ECF No. 43.
2. Defendants' deadline to respond to the Amended Complaint is August 12, 2024.
3. Given the complexity of the issues, scheduled leave, and the press of other matters, undersigned counsel requests additional time to consult with the agency, conduct legal research, and prepare the agency's response to Plaintiffs' Amended Complaint. As such, undersigned counsel requests an extension through and including October 11, 2024 to respond to Plaintiffs' Amended Complaint.
4. Plaintiffs' counsel graciously consented to the short extension of time requested herein.

WHEREFORE, Defendants respectfully request that this Court enter an Order extending Defendants' deadline to respond to Plaintiffs' Amended Complaint up through and including October 11, 2024.

Erek L. Barron
United States Attorney

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